



U.S. Department of Justice

Criminal Division

Justin Goodyear
(202) 307-5797 Direct Dial
Justin.Goodyear@usdoj.gov

Fraud Section
1400 New York Avenue, NW
Washington, D.C. 20005

August 8, 2012

Eric Snyder, Esq.
Kobre & Kim LLP
800 Third Avenue
New York, New York 10022
Email: eric.snyder@kobrekim.com

By Overnight and Hand Delivery

Johanna S. Zapp, Esq.
550J Grand Street
New York, NY 10002
Email: jszapp@aol.com

By Overnight Delivery

Re: United States v. Roland Kaufmann, Jean-Pierre
Neuhaus
Docket No. 12 CR 439 (JG)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government furnishes the discovery described in the attached discovery index with respect to the above-referenced case. The Bates range for this production is DOJ-12CR439-00000361 through DOJ-12CR439-00002056.

The discovery index describes generally the materials being produced and their corresponding Bates ranges. As that index indicates, a significant portion of the materials, in ranges DOJ-12CR439-00000427 through DOJ-12CR439-00000539 and DOJ-12CR439-00001945 through DOJ-12CR439-00001958, consists of audio recordings from December 20, 2010 through March 8, 2012. A separate enclosed audio recordings index describes the dates and times of the conversations recorded in each recording.

Due to a scanning error, the government's July 27, 2012 production included certain color photographs as black and white. Those photographs are included in color in today's production.

This production spans multiple discs. Below are the instructions to extract the volume from the discs:

- Launch the "RRLauncher.exe" file on the DVD.
- Click the "Copy to" button in the top left and select a destination folder.
- Click OK to initiate the copy.
- When it prompts you to put in the second disc, please do so.

As before, today's production is encrypted with TrueCrypt. The password will be emailed to you.

We also note that a briefcase and certain personal items found in the hotel room of defendant Kaufmann, along with copies of documents in the briefcase; copies of data downloaded from two Blackberries found in the hotel room; and copies of an address book and Axius brochure found in the hotel room; were returned to a representative of defendant Kaufmann on or about March 27, 2012. In addition, a copy of the hard drive of a laptop computer found in the hotel room of defendant Kaufmann was returned to a representative of defendant Kaufmann on or about April 2, 2012.

If you have any questions or further requests, please do not hesitate to contact me.

Very truly yours,

DENIS J. MCINERNEY
U.S. DEPARTMENT OF JUSTICE
CHIEF
CRIMINAL DIVISION, FRAUD SECTION

By:

 / E.P.S.
Justin Goodyear
Trial Attorney
(202) 307-5797

CC: Clerk of the Court (JG) (by ECF, without enclosures)

U.S. v. Kaufmann, 12 CR 439

DISCOVERY INDEX – 8/8/12 PRODUCTION
DOCUMENTS PRODUCED TO BOTH DEFENDANTS

<u>Bates Range</u>	<u>General Description</u>
DOJ-12CR439-00000361 - DOJ-12CR439-00000426	Email messages relating to Axius and other transactions
DOJ-12CR439-00000427 - DOJ-12CR439-00000539	Recordings relating to Axius and other transactions
DOJ-12CR439-00000540 - DOJ-12CR439-00000996	Email messages relating to Axius and other transactions
DOJ-12CR439-00000997 - DOJ-12CR439-00001010	Carlyle Hotel security camera recordings
DOJ-12CR439-00001011 - DOJ-12CR439-00001944	Files from smartphone of Jean-Pierre Neuhaus
DOJ-12CR439-00001945 - DOJ-12CR439-00001958	Recordings relating to Axius and other transactions
DOJ-12CR439-00001959 - DOJ-12CR439-00001966	Financial/brokerage records
DOJ-12CR439-00001967 - DOJ-12CR439-00002056	Re-produced color photographs relating to hotel room searches